



**JOINT STIPULATION**

Plaintiffs Marc Ginsberg and the Coalition for a Safer Web (collectively, “Plaintiffs”), and Defendant Google LLC, erroneously sued as Google Inc. (“Google”), jointly submit this Stipulation to extend Google’s deadline to respond to Plaintiffs’ First Amended Complaint (“FAC”):

WHEREAS, Plaintiffs filed their complaint on January 25, 2021;

WHEREAS, Google filed a motion to dismiss the complaint (ECF 14);

WHEREAS, pursuant to the stipulation of the parties (ECF 15) granted by this Court (ECF 16), Plaintiffs’ deadline to submit an opposition to Google’s motion to dismiss was June 7, 2021;

WHEREAS, in lieu of filing an opposition to Google’s motion to dismiss, Plaintiffs filed their FAC on June 8, 2021 (ECF 17);

WHEREAS, pursuant to Federal Rule of Civil Procedure 15(a)(3), Google’s deadline to respond to Plaintiffs’ FAC is June 22, 2021;

WHEREAS, Google’s counsel conferred with Plaintiffs’ counsel to request an extension of Google’s deadline to respond to the FAC, and Plaintiffs’ counsel agreed to an extension of Google’s response deadline to July 13, 2021;

WHEREAS, the parties submit that this extension is appropriate to permit Google adequate time to assess and respond to the amended complaint, and in light of overlapping deadlines in other matters;

THE PARTIES HEREBY STIPULATE AND AGREE, subject to the Court’s approval, to the following:

1. Google’s deadline to respond to Plaintiffs’ FAC shall be extended from June 22, 2021 to July 13, 2021.
2. Google consents to Plaintiffs’ filing of a corrected complaint for the sole purpose of changing the party name in the caption from “Google, Inc.” (which is incorrect) to “Google LLC.”

Respectfully submitted,

Dated: June 10, 2021

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

By: /s/ Lauren Gallo White

Lauren Gallo White  
lwhite@wsgr.com

*Attorneys for Defendant*  
GOOGLE LLC

Dated: June 10, 2021

THE LAW OFFICE OF KEITH ALTMAN

By: /s/ Keith Altman

Keith Altman  
kaltman@lawampmmt.com

*Attorneys for Plaintiffs*  
AMBASSADOR MARC GINSBERG and  
COALITION FOR A SAFER WEB

**SIGNATURE ATTESTATION**

I, Lauren Gallo White, hereby attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing of this e-filed document.

By: /s/ Lauren Gallo White

Lauren Gallo White

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated:

Honorable Beth Labson Freeman  
United States District Court Judge